

Neal, Arthur

From: Owen.Parker@ddwmson.com%inter2 [Owen.Parker@ddwmson.com] on behalf of Owen.Parker@ddwmson.com
Sent: Monday, August 08, 2005 10:34 AM
To: National List
Cc: Bill.Kamuf@ddwmson.com%inter2
Subject: Docket Number TM-0407
Attachments: ATTACHMENT.TXT

Dear sirs,

D. D. Williamson and Company headquartered in Louisville, KY is a manufacturer of caramel colors. Of course we would like to have uncertified colors remain on the National List. We currently manufacture one NOP compliant Class I caramel color (no ammonia or sulfite compounds are used). We use organic certified starting materials and a small amount of food grade sodium hydroxide during the processing which is allowed under the Standard of Identity for caramel color as is found in 21 CFR 73.85. The reason that this product is not certified organic is that our plant is not at this time certified organic, but we have started the process for certification.

The sodium hydroxide is also used to clean the reactors of any non organic residual caramel color that may have carbonized on the coils. This is known as the "kosher for passover" wash as this is what we also do when we make kosher for the passover caramel color. A solution of sodium hydroxide in water is heated to boiling in the reactor and circulated through any lines the passover or the NOP material would be in contact with to completely clean them. This is followed by a hot water rinse to remove any residual sodium hydroxide solution.

We ask that you retain uncertified colors on the National List and
we ask that you retain sodium hydroxide on the National List as a processing aid, pH neutralizer and cleaning agent.

Sincerely yours,

Owen Parker
V. P. R&D
D. D. Williamson & Co. Inc.
100 South Spring Street
Louisville, KY 40206

8/8/2005